

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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JEFFREY COHEN, on behalf of himself	:
individually, and on behalf of all similarly	:
situated employees,	: No. 09 Civ. 4352 (PKC)
	:
Plaintiffs,	:
	:
v.	:
	:
GERSON LEHRMAN GROUP, INC.,	:
	:
Defendant.	:
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DECLARATION OF GREGORY N. FILOSA
IN SUPPORT OF PLAINTIFFS' MOTION FOR SUMMARY JUDGMENT WITH
RESPECT TO LIABILITY

GREGORY N. FILOSA, an attorney admitted to practice before this Court, hereby deposes and states under penalty of perjury, that:

1. I am a member of the bar of this Court and am associated with the law firm of Thompson Wigdor & Gilly LLP ("TWG" or "Plaintiffs' Counsel"). We are counsel for Plaintiffs in the above-captioned action against Defendant Gerson Lehrman Group, Inc. ("Gerson Lehrman" or "the Company").
2. I submit this declaration with the exhibits attached hereto in support of Plaintiffs' Motion for Summary Judgment with Respect to Liability.
3. Attached hereto as Exhibit A is a true and correct copy of a letter submitted to the Court by Defendant on December 11, 2009.
4. Attached hereto as Exhibit B is a true and correct copy of the Brief for the Secretary of Labor as *Amicus Curiae* in Support of Plaintiffs-Appellant, submitted by the Secretary of Labor in *In re Novartis Wage & Hour Litig.*, 611 F.3d 141 (2d Cir. 2010).

5. Attached hereto as Exhibit C is a true and correct copy of the U.S. Department of Labor's Wage & Hour Opinion Letter FLSA 2006-27, dated July 24, 2006.

6. Attached hereto as Exhibit D is a true and correct copy of excerpts of the deposition of Plaintiff Jeffrey Cohen, taken on August 28, 2010.

7. Attached hereto as Exhibit E is a true and correct copy of excerpts of the deposition of Plaintiff Ashleigh Baldwin, taken on December 7, 2010.

8. Attached hereto as Exhibit F is a true and correct copy of excerpts of the deposition of Plaintiff Matthew Ronen, taken on October 29, 2010.

9. Attached hereto as Exhibit G is a true and correct copy of excerpts of the deposition of Todd Johnson, taken on December 7, 2009.

10. Attached hereto as Exhibit H is a true and correct copy of excerpts of the deposition of Jacquelyn Dille, taken on November 3, 2010.

11. Attached hereto as Exhibit I is a true and correct copy of excerpts of the deposition of Todd Schaefer, taken on November 5, 2010.

12. Attached hereto as Exhibit J is a true and correct copy of excerpts of the deposition of Michael Dzik, taken on November 12, 2010.

13. Attached hereto as Exhibit K is a true and correct copy of excerpts of the deposition of Samuel Jacobs, taken on November 19, 2010.

14. Attached hereto as Exhibit L is a true and correct copy of excerpts of the deposition of Dmitri Mehlhorn, taken on September 10, 2009.

15. Attached hereto as Exhibit M is a true and correct copy of the "About Us" section of Gerson Lehrman Group's website - www.glgroup.com/about.html - (last visited February 18, 2011).

16. Attached hereto as Exhibit N is a true and correct copy of Gerson Lehrman Group's Job Description for the Research Associate position, Bates-stamped GLG00000040.

17. Attached hereto as Exhibit O is a true and correct copy of Plaintiff Jeffrey Cohen's LinkedIn Profile, Bates-stamped GLG00000010-11.

18. Attached hereto as Exhibit P is a true and correct copy of Plaintiff Matt Ronen's Year End Promotion Recommendation, Bates-stamped, GLG004688-89.

19. Attached hereto as Exhibit Q is a true and correct copy of Plaintiff Jeffrey Cohen's 2008 Performance Review, Bates-stamped GLG00000075-78.

20. Attached hereto as Exhibit R is a true and correct copy of Plaintiff Matthew Ronen's 2008 Performance Review, Bates-stamped GLG004670-73.

21. Attached hereto as Exhibit S is a true and correct copy of Plaintiff Ashleigh Baldwin's 2007 Performance Review, Bates-stamped GLG004660-64.

22. Attached hereto as Exhibit T is a true and correct copy of Plaintiff Ashleigh Baldwin's 2008 Performance Review, Bates-stamped GLG004665-69.

23. Attached hereto as Exhibit U is a true and correct copy of an email from Sam Jacobs to Research Management, dated May 22, 2007.

24. Attached hereto as Exhibit V is a true and correct copy of an email chain including an email from Sam Jacobs, dated Sept. 9, 2008 and Bates-stamped RONEN 00129-34.

25. Attached hereto as Exhibit W is a true and correct copy of an email from Sam Jacobs, dated Sept. 12, 2008.

26. Attached hereto as Exhibit X is a true and correct copy of an email from Sam Jacobs, dated Sept. 30.

27. Attached hereto as Exhibit Y is a true and correct copy of an email from Sam Jacobs, dated Nov. 19, 2010 and Bates-stamped RONEN 00112-14.

28. Attached hereto as Exhibit Z is a true and correct copy of the December 19, 2008 Template Reclassification Memorandum, Bates-stamped GLG004721.

29. Attached hereto as Exhibit AA is a true and correct copy of the Fall 2008 Final Assault PowerPoint Presentation, Bates-stamped RONEN 00287-00367.

30. I declare under penalty of perjury that the foregoing is true and correct.

Dated: February 18, 2011
New York, New York

Respectfully submitted,

THOMPSON WIGDOR & GILLY LLP

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